

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	:
	:
– against –	:
	:
BARRY C. HONIG, ROBERT LADD,	:
ELLIOT MAZA, BRIAN KELLER,	:
JOHN H. FORD, GRQ CONSULTANTS, INC.	:
and HS CONTRARIAN INVESTMENTS, LLC,	:
	:
Defendants.	:
-----X	

STIPULATION AND [PROPOSED] ORDER

WHEREAS, pursuant to the Amended Civil Case Discovery Plan and Scheduling Order, entered June 10, 2020 (DE 263), fact discovery in this matter is scheduled to conclude on November 23, 2020; and

WHEREAS, the parties have agreed to conduct depositions by remote means where appropriate, as contemplated by Fed. R. Civ. P. 30(b)(4);

IT IS HEREBY STIPULATED AND AGREED, by and among the parties hereto, that depositions in this matter may be taken by telephone or video-teleconference as set forth in the relevant Notice of Deposition for each deponent.

Dated: New York, NY
July 23, 2020

ROBERT LADD

SECURITIES AND EXCHANGE
COMMISSION

By: s/ Adam C. Ford
Adam C. Ford

By: s/ Nancy A. Brown
Nancy A. Brown

Ford O'Brien, LLP
575 Fifth Avenue, Fl 17
New York, NY 10017

200 Vesey Street
Suite 400
New York, NY 10281
212-336-0106

Attorneys for Defendant Robert Ladd

Attorneys for Plaintiff Securities and
Exchange Commission

SO ORDERED:

UNITED STATES DISTRICT JUDGE